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19 Attorneys for Plaintiffs

20 UNITED STATES DISTRICT COURT
21 CENTRAL DISTRICT OF CALIFORNIA
22 WESTERN DIVISION

23 JERALD FRIEDMAN, Individually and)
24 on Behalf of All Others Similarly)
25 Situated,) Plaintiff,
26 vs.)
27 AARP, INC., AARP SERVICES INC.,)
28 AARP INSURANCE PLAN,)
UNITEDHEALTH GROUP, INC. and)
UNITEDHEALTHCARE INSURANCE)
COMPANY,) Defendants.

28

29 Case No. 2:14-cv-0034-DDP-PLA
30 CLASS ACTION
31 DECLARATION OF STUART A.
32 DAVIDSON IN SUPPORT OF
33 PLAINTIFFS' MOTION FOR CLASS
34 CERTIFICATION
35 Judge: Hon. Dean D. Pregerson
36 Magistrate: Hon. Paul L. Abrams
37 Hearing: February 25, 2019
38 Time: 10:00 a.m.

I, STUART A. DAVIDSON, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of
3 the State of Florida. I am a member of the law firm of Robbins Geller Rudman &
4 Dowd LLP, and I am one of the attorneys of record for plaintiffs Jerald Friedman
5 and Carol McGee (collectively, “Plaintiffs”) in this case. I have personal
6 knowledge of the matters stated herein, and, if called upon, I could and would
7 competently testify thereto.

8 2. The foregoing exhibits are being submitted in connection with
9 Plaintiffs' Motion for Class Certification:

Exhibit B Memorandum to ASI Board of Directors dated August 16, 2013, AARP FRI 00017794.

13 || **Exhibit C** Excerpts from Deposition of Jerald Friedman.

14 | **Exhibit D** Excerpts from Deposition of Carol McGee.

15 || Exhibit E Robbins Geller Rudman & Dowd LLP Firm Resume.

16 || **Exhibit F** Sean K. Collins Biography.

18 I declare under penalty of perjury under the laws of the United States of
19 America that the foregoing is true and correct. Executed this 26th day of December
20 2018, at Boca Raton, Florida.

s/ *Stuart A. Davidson*
STUART A. DAVIDSON

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2 CERTIFICATE OF SERVICE

3 I hereby certify that on December 26, 2018, I authorized the electronic filing
4 of the foregoing with the Clerk of the Court using the CM/ECF system which will
5 send notification of such filing to the e-mail addresses denoted on the attached
6 Electronic Mail Notice List, and I hereby certify that I caused to be mailed the
7 foregoing document or paper via the United States Postal Service to the non-
8 CM/ECF participants indicated on the attached Manual Notice List.

9 I certify under penalty of perjury under the laws of the United States of
10 America that the foregoing is true and correct. Executed on December 26, 2018.

11

12 s/ Stuart A. Davidson

13 STUART A. DAVIDSON

14

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DAVIDSON DECL. ISO
PLTFS' MOT. FOR CLASS CERT.
2:14-cv-00034-DDP-PLA